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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)

Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

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JUN 13 1997

MM Docket No. 87-268
Federal Communications Commission
Office of Secretary

To: The Commission

**PETITION FOR PARTIAL RECONSIDERATION
OF THE SIXTH REPORT AND ORDER**

Respectfully submitted,

WCPX LICENSE PARTNERSHIP

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June 13, 1997

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TABLE OF CONTENTS

Summary.....	i
I. Introduction.....	1
II. WCPX Should Be Allowed to Switch to its DTV Operation to Channel 6 at the End of the Transition Period.....	6
III. The Commission Should Assign WCPX a Core DTV Channel if WCPX Cannot Return to Channel 6.....	10
IV. Conclusion.....	14

SUMMARY

WCPX License Partnership is the licensee of Television Station WCPX, Orlando, Florida. WCPX operates on NTSC Channel 6, employing effective radiated power of 100 kilowatts with an antenna height above average terrain of 445 meters. Although WCPX's strong preference would be to return to Channel 6 as a digital television (DTV) channel, the Commission appears to be precluding that possibility in the Sixth Report and Order. To compound this problem, the Commission has assigned DTV Channel 58 for WCPX, a frequency that is not even within the "core spectrum" established for DTV.

For reasons set forth herein, fundamental fairness requires that the Commission make a firm commitment to allow WCPX to return to Channel 6 for DTV operation at the end of the transition period. If such a firm commitment cannot be made on reconsideration, the Commission should at the very least assign a DTV channel for WCPX that is within the core spectrum so that WCPX may undertake prudent DTV planning and not face two separate channel changes with the resultant large-scale viewer confusion.

The Commission could have eliminated the unfair competitive disadvantage it has placed upon WCPX by permitting WCPX to operate on Channel 6 at the end of the transition period. Failing that, the Commission could have mitigated the disadvantage by assigning a core spectrum DTV channel for WCPX during the transition period.

ii.

The Commission did neither. Instead, for unexplained reasons, the Commission assigned core spectrum DTV channels to the holders of two unbuilt construction permits for television stations in the Central Florida area (one in Orlando). If the Commission is truly committed to its stated policy of encouraging the rapid development of DTV from construction, equipment and viewership perspectives, it cannot justify the relegation of one of the most important television services in Central Florida to a channel in the non-core DTV spectrum while assigning core channels to permittees that have not yet even built out their NTSC channels.

The Commission should reconsider in part the Sixth Report and Order to establish the principle that, at the end of the transition period, stations such as WCPX that currently operate on Channel 6 will be able to switch their DTV operation back to Channel 6. Alternatively, the Commission should make a special exception for WCPX based on its more than 40-year track record and successful coexistence with noncommercial FM stations and permit it to operate on DTV Channel 6 at the end of the transition period. If the Commission is unwilling to make these adjustments, it should then modify WCPX's DTV channel allotment from Channel 58 to a channel on which WCPX can continue to operate at the end of the transition period -- either Channel 14 or 46.

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To: The Commission

**PETITION FOR PARTIAL RECONSIDERATION
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WCPX License Partnership, by its counsel and pursuant to Section 1.106 of the Commission's Rules, requests that the Commission partially reconsider the Sixth Report and Order (FCC 97-115, released April 21, 1997) in the above-captioned proceeding to permit WCPX(TV)'s eventual digital television operation on Channel 6 or to provide alternate port hereof, WCPX License Partnership states as follows:

I. INTRODUCTION

1. WCPX License Partnership is the licensee of Television Station WCPX, Orlando, Florida. WCPX operates on NTSC Channel 6, employing effective radiated power of 100 kilowatts with an antenna height above average terrain of 445 meters. See Attachment 1 hereto (Technical Statement of Louis R. du Treil, Sr.). Although WCPX's strong preference would be to return to Channel 6 as a

digital television (DTV) channel, the Commission appears to be precluding that possibility in the Sixth Report and Order. To compound this problem, the Commission has assigned DTV Channel 58 for WCPX, a frequency that is not even within the "core spectrum" established for DTV.

2. The Channel 58 assignment was part of the Commission's decision in the Sixth Report and Order to adopt a Digital Television Table of Allotments in new § 73.622 of its Rules and assign to eligible television broadcast licensees a new channel for digital television (DTV) operation. See Appendices B and E to the Sixth Report and Order. The Commission determined to use Channels 2-51 as the "core spectrum" for DTV channel allotments, and sought wherever possible to avoid allotting a channel above Channel 51 for DTV. See Sixth Report and Order at ¶¶ 76, 82-84. Nevertheless, the Commission assigned DTV Channel 58 for WCPX.

3. At the same time, the Commission determined to avoid wherever possible using Channel 6 (WCPX's current NTSC channel) in developing the DTV allotments. Id. at ¶ 151. If that determination stands, WCPX could not return to Channel 6 for DTV operation at the conclusion of the period of transition from NTSC to DTV. Accordingly, the Commission's actions assigning Channel 58 for WCPX and precluding the eventual use of Channel 6 would, if not modified on reconsideration, require WCPX License Partnership to implement two separate channel changes to implement DTV operations -- to Channel 58 during the transition period and, at the end of

the transition period, to an unspecified channel (other than Channel 6) within the core spectrum.

4. For reasons set forth herein, fundamental fairness requires that the Commission make a firm commitment to allow WCPX to return to Channel 6 for DTV operation at the end of the transition period. If such a firm commitment cannot be made on reconsideration, the Commission should at the very least assign a DTV channel for WCPX that is within the core spectrum so that WCPX may undertake prudent DTV planning and not face two separate channel changes with the resultant large-scale viewer confusion.

5. A careful review of the effect on WCPX of the Commission's actions in the Sixth Report and Order reveals that those actions are, with respect to WCPX, arbitrary and capricious. As a result, the Commission must reconsider those actions.¹ The Commission has placed special burdens on licensees affiliated with the four largest television networks, particularly in the largest markets, and in allocating those burdens has deemed audience share to be a factor in certain instances. As a CBS affiliate in a Top 30 television market (with, according to Nielsen, the third-highest viewership in Central Florida), WCPX License Partnership has a special burden of building out its DTV facility by November 1, 1999. See Fifth Report and Order, at ¶ 76. WCPX License

¹ As explained below, this is particularly true given the Commission's core spectrum DTV allotments to two unbuilt television stations in Central Florida.

Partnership should not be saddled with the additional burden of building out on a DTV channel outside the core spectrum. Not knowing what channel it will ultimately operate on as a DTV station will severely constrain WCPX's ability to plan its DTV operations effectively. Because WCPX shares a tower with two other VHF stations, the main PBS station for Central Florida and three FM stations (including two noncommercial FM stations), the impact of this uncertainty will have an indirect adverse effect on other stations as well because WCPX will likely be forced to reduce usage of the tower to preserve flexibility until it finds out the DTV channel on which it will ultimately operate. Additionally, the burden of changing DTV channels twice (to Channel 58 during the transition period and to an unspecified channel at the end of that period with the prospect that the second DTV channel change may not be WCPX's NTSC channel), places WCPX at an unfair competitive disadvantage to stations in Orlando and Central Florida that do not face similar costs and constraints.

6. The competitive disadvantage created by the DTV assignment process is magnified by the Commission's erroneous analysis of WCPX's predicted DTV operation on Channel 58. The Commission indicates that such operation would replicate the station's NTSC service area. See Sixth Report and Order at Appendix B, Table 1, p. B-14. However, the Commission's analysis failed to account for the loss of service from WCPX License Partnership's translator station W29AB in Ocala, Florida, which provides necessary fill-in service within the predicted WCPX Grade

B contour.² When the loss of the translator is considered, WCPX's operation on DTV Channel 58 is predicted to result in a loss of more than 9% (approximately 3,023 square kilometers) of the station's current service area, and a population loss in excess of 129,000 people (based on the 1990 census data). These figures actually understate the loss, because the height of WCPX's DTV antenna during the transition period will be at least 25 feet lower than the height of the station's NTSC antenna.

7. The Commission could have eliminated the unfair competitive disadvantage it has placed upon WCPX by permitting WCPX to operate on Channel 6 at the end of the transition period. Failing that, the Commission could have mitigated the disadvantage by assigning a core spectrum DTV channel for WCPX during the transition period. The Commission did neither. Instead, for unexplained reasons, the Commission assigned core spectrum DTV channels to the holders of two unbuilt construction permits for television stations in the Central Florida area (one in Orlando).³ If the Commission is truly committed to its stated policy of encouraging the rapid development of DTV from construction, equipment and viewership perspectives, it cannot justify the relegation of one of the most important television services in

² W29AB's operation on Channel 29 would be precluded pursuant to the Commission's assignment of Channel 29 as a DTV channel to Station WFTS in the Tampa market.

³ The Commission assigned DTV Channel 14 to WZKY-TV, Orlando (NTSC Channel 27), and assigned DTV Channel 46 to WLCB-TV, Leesburg (NTSC Channel 45).

Central Florida to a channel in the non-core DTV spectrum while assigning core channels to permittees that have not yet even built out their NTSC channels.

8. In view of these circumstances, WCPX License Partnership respectfully requests that the Commission reconsider in part the Sixth Report and Order to clarify that Channel 6 will be available for WCPX to use for DTV service at the end of the transition period. If the Commission cannot make a firm commitment now that Channel 6 will be available for WCPX's DTV operation at the end of the transition period, WCPX License Partnership respectfully requests that the Commission assign DTV Channel 46 or 14 for WCPX at Orlando, and assign DTV Channel 58 either for WLCB-TV (in lieu of DTV Channel 46) or WZKY-TV (in lieu of DTV Channel 14), as necessary to accommodate the assignment of the new core-spectrum DTV channel for WCPX.

II. WCPX SHOULD BE ALLOWED TO SWITCH ITS DTV OPERATION TO CHANNEL 6 AT THE END OF THE TRANSITION PERIOD

9. Although the Commission proposed in its Sixth Further Notice of Proposed Rulemaking⁴ in this proceeding (the "Sixth Further Notice") not to use the low VHF channels (2-6) for DTV purposes, it concluded in the Sixth Report and Order (at ¶ 83) that the better approach was to include Channels 2-6 in the DTV Table of Allotments at this time. However, the Commission assigned DTV

⁴ MM Docket No. 87-268, 11 FCC Rcd 10968 (1996).

Channel 6 to only two stations and left open the possibility that it could still determine that Channels 2-6 are unacceptable for DTV use and adjust the core spectrum for DTV to Channels 7-51. Id. at ¶¶ 83, 151.⁵

10. The available evidence indicates that the Commission's concerns about using the low VHF channels for DTV are unfounded. See, e.g., "Petition for Reconsideration of Decision Regarding Channels 2-6" filed in this proceeding on May 29, 1997, by Certain Channel 2-6 Licensees. Further, the significant propagation benefits that these channels provide outweigh any slight disadvantages that might result from higher noise levels.

11. WCPX License Partnership's engineering consultant, the firm of du Treil, Lundin & Rackley ("DLR"), previously filed comments with the Commission in response to the Sixth Further Notice that addressed the use of low VHF channels for DTV and explained why Channels 2-6 can and should be used for DTV. DLR described the results of the field tests conducted in September 1994 and October 1995 of the Grand Alliance HDTV transmission subsystem and the terrestrial broadcast transmission field tests of the Grand Alliance HDTV system prototype. DLR stated:

The Charlotte report summarizes that because of the limited sample size and interference experienced, the low VHF results are

⁵ The Commission noted that if it ultimately concludes that Channels 2-6 are acceptable for DTV use it will consider adjusting the core spectrum used for DTV to Channels 2-46.

inconclusive. The report suggests, and DLR agrees, that more field testing is desirable. However, the report states that DTV performs significantly better than NTSC at low VHF. It may be that more DTV power than has been initially anticipated at low VHF for DTV service will resolve the problem. The report does not conclude that low VHF is not suitable for DTV. It is believed that there is insufficient evidence for the FCC to conclude that the low VHF channels are unsuitable for DTV service.

See Attachment 2 hereto ("Comments of du Treil, Lundin & Rackley, Inc. in Sixth Further Notice of Proposed Rule Making") at pp. 6-7 (emphasis added).⁶

12. To the extent that DTV service on Channels 2-6 meets or exceeds the level of NTSC performance on those channels, there is no reason for the Commission to preclude their use for DTV now or at the conclusion of the transition period. Indeed, because of the superior propagation characteristics of the low VHF channels, and the ability for DTV operation on these channels to replicate existing NTSC service, the Commission should retain the low VHF channels for DTV use.

13. Assuming the acceptability and use of the low VHF channels, the Commission should not generically preclude the use of Channel 6 for DTV. The Commission should either permit such use in general or, at the very least, review the circumstances unique to each particular station operating on Channel 6. In the case of

⁶ Of particular applicability to WCPX is the fact that the Charlotte tests occurred on Channel 6.

WCPX, it has operated on Channel 6 since the 1950's. It has taken and continues to take a proactive approach to minimize any potential interference with noncommercial FM stations operating in its area. Two such stations in the Orlando area have working agreements with WCPX and are co-located on the WCPX tower. Indeed, one of the stations uses a combined signal from the WCPX antenna to reduce the risk of interference. WCPX License Partnership is unaware of any interference complaints regarding its operation and the operation of the two noncommercial radio stations. WCPX will continue its cooperation with these stations during the transition period with respect to its NTSC operation, and if permitted to move its DTV operation to Channel 6 at the end of the transition period will continue to work with these stations. However, Commission assurance that WCPX will be able to move its DTV operation to Channel 6 at the end of the transition period is important for WCPX and all concerned noncommercial stations to be able to plan effectively for the future.⁷

14. The minuscule risk of interference to noncommercial FM stations from allowing WCPX to continue to use Channel 6 for DTV operation after the transition period is highlighted by WCPX's successful operation on Channel 6 for more than 40 years. In allowing WCPX to return to Channel 6 for DTV operation at the end of the transition period, the Commission would not affect adversely

⁷ Such planning includes factors such as antenna design, transmission line configuration, wind loading, placement of antennas on the tower, and coordination among stations seeking to locate or remain on the tower.

the Commission's interest in avoiding interference between operation on Channel 6 and noncommercial FM stations. Sixth Report and Order, ¶¶ 148-151. WCPX has demonstrated that its operation on Channel 6 in Orlando is compatible with the operation of noncommercial FM stations in the market. Given that the Commission did not adopt an absolute prohibition on adding DTV allotments on Channel 6, it must analyze whether individual stations whose NTSC operation is on Channel 6 should be permitted to switch their DTV operation to that channel when the transition period ends. In view of WCPX's long-term, successful operation, the Commission should conduct that analysis now and, on reconsideration, state that WCPX will be permitted to return to Channel 6 at the end of the transition period. Indeed, leaving WCPX uncertain as to the DTV channel from which it will broadcast would have a far greater adverse effect on noncommercial operations given that WCPX may no longer be able to provide tower space for two noncommercial FM stations as well as a noncommercial television station if it is uncertain as to the DTV channel on which it will ultimately broadcast.

**III. THE COMMISSION SHOULD ASSIGN WCPX A CORE
DTV CHANNEL IF WCPX CANNOT RETURN TO CHANNEL 6**

15. It is WCPX License Partnership's clear preference to switch WCPX's DTV operation to Channel 6 at the end of the transition period. If the Commission makes a firm commitment that WCPX may operate on DTV Channel 6 at the end of the transition

period, the WCPX would not object to operation on DTV Channel 58 during the transition period. However, the Commission has thus far not committed to allowing the use of the low VHF channels for permanent DTV operation, and has indicated a general reluctance to use Channel 6 for DTV. If the Commission does not respond to WCPX License Partnership's request for partial reconsideration of the Sixth Report and Order by permitting WCPX to return to Channel 6 for DTV operation at the end of the transition period, the Commission should assign for WCPX a core spectrum channel for its DTV operation.

16. As a CBS affiliate in a Top 30 market, WCPX is required to initiate DTV operations no later than November 1, 1999. Fifth Report and Order at ¶ 76. The Commission should not require WCPX to initiate DTV service expeditiously on a channel that WCPX must vacate at the end of the transition and concurrently preclude the station from switching to its former NTSC channel. If the Commission is going to require the rapid deployment of a DTV facility but preclude a return to Channel 6, the Commission should at the minimum assign a DTV channel to WCPX that it can continue to operate at the end of the transition period.

17. WCPX License Partnership has undertaken an engineering analysis of potentially available alternate DTV channel allotments for WCPX. See Attachment 1 hereto. There are no currently unallotted channels that will work at the WCPX antenna location. However, the Commission has assigned two DTV channels to the

holders of unbuilt construction permits in Central Florida, Channel 14 to WZKY-TV, Orlando, and Channel 46 to WLCB-TV, Leesburg. The permits for both of these stations were granted many years ago, and both stations have obtained repeated extensions of construction deadlines.⁸ Indeed, the Commission cancelled and/or deleted the WLCB-TV permit in February 1997, but subsequently reinstated it. As for WZKY-TV, with its long-pending application for an extension of the construction permit the station has not been constructed and there is no indication of its likely construction in the foreseeable future.

18. Neither WLCB-TV nor WZKY-TV has WCPX's burden of rapid deployment of DTV operation.⁹ Despite the unbuilt and uncertain status of these two construction permits, the Commission assigned DTV channels within the core DTV spectrum for each station. WCPX License Partnership has determined, to the extent currently possible, that DTV channels 14 and 46 will work from WCPX's authorized transmitter site, and that Channel 58 can be substituted as a DTV allotment for either of these permits. See Attachment 1

⁸ The original construction permit for WLCB-TV was granted in 1987 (BPCT-860820KH), and has been modified or extended approximately seven times. The original construction permit for WZKY-TV as granted in January 1990 (BPCT-850320KR), and has been modified or extended approximately four times, with the most recent extension application pending since October 1995. See BMPCT-951025KO.

⁹ This would remain true even if the stations were constructed immediately, because they are not affiliated with a major network.

hereto.¹⁰ If the Commission does not resolve that Channel 6 will be available for DTV use by WCPX, the Commission should assign either Channel 46 or 14 for WCPX Limited Partnership for DTV use by WCPX, and substitute Channel 58 as necessary.

19. The Commission has placed considerable pressure on WCPX and other network affiliates in Top 30 markets to begin DTV operations rapidly. The vast majority of such stations know that they will be able to continue to operate on their DTV channel, or switch their DTV operation to their NTSC channel, after the transition period. They do not face the uncertain future that the Commission has mandated for WCPX because of the Commission's policy choices to limit the channels available for DTV use. If the Commission is going to place extraordinary requirements on a broadcaster such as WCPX License Partnership to assist in the development and rapid transition to DTV, it should at minimum assign a DTV channel on which the station can continue to operate past the transition period, thereby avoiding the need to make two channel switches to new channels with which the audience does not associate the station.

¹⁰ It is not possible to make a complete analysis of the operating parameters and interference effects for these allotments because the Commission has not yet released Office of Engineering and Technology Bulletin No. 69, which contains the information needed to compute coverage and interference characteristics of a proposed channel allotment. Because the Commission has not released this critical information, WCPX reserves the right to supplement this Petition within 30 days after the release of OET Bulletin No. 69 to address matters related to the information contained therein.

20. DTV transition costs will involve far more than installing the necessary equipment. They also will involve educating the public as to where a particular station's programming may be found. Because WCPX will continue to operate on Channel 6 during the transition period, the public will continue to associate that channel with WCPX's programming. During the transition, the audience will also come to associate WCPX's DTV programming with its DTV channel. At the end of the transition period, WCPX should not have to begin operating on a completely new channel associated with neither its NTSC nor its DTV programming. Under the circumstances, it is logical, practical, and equitable for the Commission to make certain that WCPX can return to Channel 6 as its post-transition DTV channel. If that is not possible, the Commission should assign to WCPX a DTV channel that it can continue to use past the transition period -- in this case, Channel 14 or 46.

IV. CONCLUSION

21. The Commission should reconsider in part the Sixth Report and Order to establish the principle that, at the end of the transition period, stations such as WCPX that currently operate on Channel 6 will be able to switch their DTV operation back to Channel 6. Alternatively, the Commission should make a special exception for WCPX based on its more than 40-year track record and successful coexistence with noncommercial FM stations and permit it to operate on DTV Channel 6 at the end of the transition period. If the Commission is unwilling to make these adjustments, it should

then modify WCPX's DTV channel allotment from Channel 58 to a channel on which WCPX can continue to operate at the end of the transition period -- either Channel 14 or 46.

WHEREFORE, WCPX License Partnership respectfully requests the Commission to GRANT partial reconsideration of and MODIFY the Sixth Report and Order consistent with the requests set forth herein.¹¹

Respectfully submitted,

WCPX LICENSE PARTNERSHIP

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June 13, 1997

¹¹ To the extent that the Commission's Rules require service of this petition upon parties to the above-captioned proceeding, WCPX License Partnership requests a waiver of such requirement in light of the burdensome nature of such service. The Sixth Report and Order lists over 450 parties who filed comments in the proceeding and nearly 90 parties who filed reply comments.

ATTACHMENT 1

Technical Statement of Louis R. du Treil, Sr.

TECHNICAL STATEMENT
WCPX LICENSE PARTNERSHIP
STATION WCPX-TV
ORLANDO, FLORIDA

This statement was prepared on behalf of WCPX License Partnership, licensee of television broadcast station WCPX-TV Orlando, Florida in support of a petition for reconsideration of the Federal Communications Commission action in MM Docket No. 87-268, In the Matter of *Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service, Sixth Report and Order*, herein "Sixth Report".

Station WCPX-TV operates on channel 6, employing effective radiated power of 100 kilowatts with antenna height above average terrain of 445 meters. It is strongly believed that channels 2 through 6 should be retained for DTV use. There is no technical reason to exclude these channels, which are known to have superior propagation characteristics as compared with UHF channels.

Station WCPX-TV was assigned channel 58 in the Sixth Report. As channel 58 is outside of the proposed "core" spectrum, and the existing NTSC channel 6 may also be outside of the "core", a alternative DTV channel is requested. An alternative may be available by rearrangement of proposed DTV allotments or by allocation of a new channel based on criteria contained in OET Bulletin No. 69, which is not yet available.

Review of DTV channels assigned in the Orlando area indicates that NTSC channel 27 has been paired with DTV channel 14. Also, NTSC channel 45 at Leesburg, Florida was paired with DTV channel 46. Neither of these NTSC stations is on the air (or under construction) making implementation of prompt DTV service by these stations difficult if not impossible for the near future. Either channel 14 or 46 could be used by WCPX-TV for immediate implementation of DTV service. The current NTSC stations proposed for operation on channel 27 and 46 could employ channel 58 (or other then available channel) for DTV use, when they ultimately begin DTV service.

After issuance of OET Bulletin No. 69, WCPX-TV requests the opportunity to review the DTV assignment to determine if a better arrangement of channels is possible.

du Treil, Lundin & Rackley, Inc.

A Subsidiary of A. D. Ring, P.C.

Station WCPX-TV

Page 3 of 3

The proposed arrangement would permit WCPX-TV to implement DTV service on a fast, economical track.



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June 12, 1997

ATTACHMENT 2

Comments of du Treil, Lundin & Rackley, Inc.
in Sixth Further Notice of Proposed Rule Making

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of Advanced
Television Systems and Their
Impact Upon the Existing
Television Broadcast Service

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MM Docket No. 87-268

Comments of of du Treil, Lundin & Rackley, Inc. in
Sixth Further Notice of Proposed Rule Making

These comments are submitted on behalf of the firm of du Treil, Lundin and Rackley, Inc. (dLR). This firm and its predecessors have been practicing consulting communications engineering before the Federal Communications Commission (FCC) and industry for more than 50 years. These comments of dLR concern the FCC's Sixth Further Notice of Proposed Rule Making (FNPRM) in MM Docket No. 87-268. This proceeding concerns advanced television systems and their impact upon the existing television broadcast service. In the FNPRM the FCC has proposed an allotment table for digital television (DTV) assignments, with associated effective radiated powers (ERP) to replicate existing coverage. The FNPRM also proposes to reclaim the spectrum presently used for TV service, and make it available for other services.

This firm wishes to commend the FCC and industry with regard to the accomplishments made to date in the advanced television proceeding. There has been much achieved and there is a considerable amount yet to be done. A new and complex means of providing television signals is bound to generate differing opinions on how to achieve the ultimate goal, the best digital television (DTV) broadcast technology, while providing each existing viewer with continued television service from our American, free, off-the-air system. Furthermore what is known or believed today may easily change tomorrow based on new information. It is in this spirit that dLR submits its comments in the proceeding.

The primary goals for implementation of the DTV service is full accommodation and replication of existing NTSC (National Television Systems Committee) service. The FCC and Broadcast Caucus (BC) have proposed to accomplish this through the allotment of a second TV channel to certain eligible television assignments. (Eligibility generally based on status as of October 1991.) Along with the second channel is a DTV effective radiated power (ERP) intended to replicate the station's existing NTSC service at the station's same antenna height above average terrain (HAAT). The information contained in the FCC's proposed DTV allotment table is based on planning factors developed and available to the FCC at the time it made the allocation studies. It is the beginning point for the DTV allotment process, not necessarily the concluding point. The